

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

Jiangsu Huari Webbing  
Leather Co., Ltd.

Plaintiff

v.

Joes Identified in  
Schedule "A"

Defendants.

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Case No. 23-cv-2605

**DECLARATION OF JIYUAN ZHANG**

I, Ji Yuan Zhang, hereby declare as follows:

1. I am an attorney with the law firm of J. Zhang & Associates, P.C. located at 136-20 38th Avenue, Ste 11G, Flushing, NY 11354 and represents Jiangsu Huari Webbing Leather Co., Ltd in the above-referenced action. I make and submit this declaration in connection with Plaintiff's Opposition to Defendant, NinjaSafe's Motion for Attorney Fees, Bond Damages and Sanction.

2. **Exhibit A:** Results of a search conducted through Lexis CourtLink, narrowing down to "defendant-litigate" with the keyword "schedule A" and focusing on intellectual property cases. The search spanned from January 1, 2019, to December 31, 2023, resulting in a total of 2,870 cases.

3. **Exhibit B:** Results of a search conducted through Lexis CourtLink, specifically narrowed down to "defendant-litigate" using the keywords "schedule A" and "intellectual property" within the timeframe of January 1, 2019, to December 31, 2023, with a focus on cases in the state of New York. The search yielded a total of 45 cases.

4. **Exhibit C:** A true and correct copy of the U.S. Patent 11,468,673, also known as the "'673 Patent."

5. **Exhibit D:** A true and correct copy of the NinjaSafe's Amazon frontstore and its listings.

6. **Exhibit E:** A true and correct copy of the documentation pertaining to NinjaSafe's registration from the state of Delaware (Delaware.gov).

7. **Exhibit F:** A true and correct copy of believed to be NinjaSafe own operated webpage.

8. **Exhibit G:** A true and correct copy of the search and verification for NinjaSafe's listed address at 2093 Philadelphia Pike #2340, Claymont, DE, 19703, US.

9. **Exhibit H:** A true and correct copy of the service of complaint and claim chart served on the Defendant's counsel via email.

10. **Exhibit I:** A true and correct copy of the email exchanges with the Defendant's counsel.

11. **Exhibit J:** An article titled "When Is The Best Time To Buy Home Exercise Equipment?" published on the website <https://the-home-gym.com/>. This article listed several months

12. **Exhibit K:** An article titled "When Is the Best Time to Buy Outdoor Gear?" published on nytimes.com.

I declare that the foregoing is true.

Dated: May 16, 2023  
Queens, New York

/s/ Jiyuan Zhang  
Jiyuan Zhang